

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicant:	Atul N. Hatakhar	Art Unit:	2155
Serial No.:	09/753,086	Examiner:	Benjamin R. Bruckart
Filed:	December 28, 2000	Assignee:	Intel Corporation
Title:	BROADCAST COMMUNICATION SYSTEM WITH DYNAMIC CLIENT-GROUP MEMBERSHIPS		

Mail Stop Appeal Brief - Patents

Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

REPLY BRIEF

Pursuant to 37 C.F.R. § 41.41, Applicant responds to the Examiner's Answer mailed July 3, 2008 as follows.

At page 10, the Examiner's Answer contends that **"The Appellant Argues:** That the Yamashita reference does not teach 'a first map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of two or more clients in the digital cable broadcast system.'" (Emphasis in original).

Applicant respectfully disagrees and submits that this misunderstanding lies at the heart of the present improper rejections. In particular, Applicant has repeatedly contended that Yamashita neither describes nor suggests that such maps be transmitted to clients in a digital cable broadcast system. See, e.g., Appeal Brief, page 7, line 12-16 (disagreeing with the contention that Yamashita transmits first and second maps that associate identifiers of clients in a digital cable broadcast system with identifiers of groups in the digital cable broadcast system, as recited in claim 27); page 15, line 3-10 (disagreeing with the contention that Yamashita includes a head end that includes a transmitter to transmit a map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of two or more clients, as recited in claim 36).

As discussed at length in the appeal brief, Yamashita describes the transmitted EMM as a (single) identification number and a (single) subscriber control signal. *See, e.g., Yamashita*, col. 4, line 47-49. According to Yamashita, the identification number is a unique number assigned to each subscriber. *See, e.g., id.*, col. 4, line 49-52; line 53-56. This assigned unique identification number is used to determine whether subsequently received EMM information is addressed to the subscriber's terminal. *See, e.g., id.*, col. 5, line 16-22. The subscriber control signal includes contract data. *See, e.g., id.*, col. 5, line 23-25. This contract data corresponds to the particular subscriber's contract information. *See, e.g., id.*, col. 5, line 37-39. At the subscribers' terminals, descramble keys are generated only when the contract data allows the scrambled program to be descrambled. *See, e.g., id.*, col. 5, line 26-40; col. 8, line 28-48.

Yamashita's EMM information therefore is not a map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of clients. Rather, Yamashita's EMM information is uniquely addressed to each subscriber to individually inform each subscriber of that subscriber's particular contract information.

The technological advantages of transmitting such maps are explicitly described in the specification. In particular, individually addressing client-specific messages may be cumbersome and time-consuming for the host processor, reducing the available bandwidth in the communication link. *See, e.g., id.*, page 1, line 15-19. Yamashita's suffers from these deficiencies since EMM information is uniquely addressed to each individually subscriber.

At page 11, the Examiner's Answer contends that "[f]urther, the terms first and second map are not interpreted be data structures containing complete listings. The maps are there to 'associate' identifiers of clients with identifiers of groups."

Applicant agrees that the recited maps are not required to be complete listings. However, claim 27 calls for:

- a first map that associates identifiers of clients in a digital cable broadcast system with identifiers of groups of two or more clients in the digital cable broadcast system;

- a second map that includes associations between subscriber identifiers and client group identifiers that have been changed;

- first and second maps that are both transmitted to available clients in the digital cable broadcast system; and

- clients in the digital cable broadcast system that are configured to compare the first group identifier broadcast in association with the digital cable content with any group identifiers from a most recently received one of the first map and the second map.

Thus, while the maps in claims 27 are not required to be complete listings, they are required to have the foregoing characteristics that are neither described nor suggested by Yamashita's EMM information.

Independent claim 36 calls for:

- a head end that includes a map that associates identifiers of clients in the broadcast system with identifiers of groups of clients;

- a head end that includes a transmitter to transmit such a map;

- clients, each of which includes a receiver to receive such a map; and

- logic to identify one or more groups to which the client belongs from the received map.

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Thus, while the maps in claims 36 are not required to be complete listings, they are required to have the foregoing characteristics that are neither described nor suggested by Yamashita's EMM information.

For these reasons, and the reasons stated in the Appeal Brief, Applicant submits that the final rejections should be reversed.

Please apply any charges or credits to Deposit Account No. 06-1050.

Respectfully submitted,

Date: September 2, 2008

/John F. Conroy, Reg. # 45,485/

John F. Conroy
Reg. No. 45,485

Fish & Richardson P.C.
Regus Business Center
Landsberger Strasse 155
Munich 80687
Germany
Telephone: 011 49 (89) 57959 - 125
Facsimile: (877) 769-7945